

SCOTT ERIK ASPHAUG, OSB #833674

Acting United States Attorney

District of Oregon

CHRISTOPHER CARDANI, MASB #550609

Assistant United States Attorney

Christopher.Cardani@usdoj.gov

1000 SW Third Ave., Suite 600

Portland, Oregon 97204-2902

Telephone: 503-727-1000

Attorneys for the United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

3:21-cv-01481-BR

Plaintiff,

v.

AMENDED COMPLAINT, *in rem*, FOR FORFEITURE

**SIXTEEN (16) REAL PROPERTIES
(DEFENDANT REAL PROPERTIES),
LOCATED IN COLUMBIA COUNTY,
POLK COUNTY, LINN COUNTY,
CLATSOP COUNTY, AND
MULTNOMAH COUNTY, STATE AND
DISTRICT OF OREGON WITH
BUILDINGS, APPURTENANCES, AND
IMPROVEMENTS, *in rem*,**

Defendants.

This complaint is amended to correct the addresses previously written as:

1. 5145 Red Prairie Road SE, Sheridan, Oregon 97378, and
2. 91692 Taylorville SE Grant Street, Portland, Oregon 97233;

Now reading as:

1. 5145 Red Prairie Road, Sheridan, Oregon 97378, and

Amended Complaint *in rem* for Forfeiture

Page 1

2. 91692 Taylorville Road, Westport, Oregon 97016.

Plaintiff, United States of America, by Scott Erik Asphaug, Acting United States Attorney for the District of Oregon, and Christopher Cardani, Assistant United States Attorney, for its Amended Complaint *in rem* for forfeiture, alleges:

COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, consisting of sixteen (16) pieces of real properties (hereinafter, DEFENDANT REAL PROPERTIES), are further described as:

- a. **91844 Rulyville Road, Clatskanie, Oregon 97016:** more particularly described as,

Parcel Number: 806260003700

Beginning at the Northeast corner of a tract of land conveyed by Wauna Lumber Company to Lawrence Sorensen and Edna V. Sorensen by Deed recorded March 30, 1962 in Book 263, Page 553, Clatsop County Records; thence Southeasterly along the Easterly line of said tract of land to a point on the Northerly right of way line of the existing county road; thence Easterly along said Northerly right of way line a distance of 425 feet, more or less, to a point on the Southwesterly right of way line of the existing U. S. Highway No. 30; thence Northwesterly along said Southwesterly right of way line a distance of 550 feet; thence in a Southwesterly direction a distance of 300 feet, more or less, to the point of beginning, all of the above being situate in Tracts 11 and 12, WAUNA ACREAGE TRACTS, County of Clatsop, State of Oregon.

EXCEPTING THEREFROM the following described tract:

A parcel of land lying in Tract 11 of WAUNA ACREAGE TRACTS, County of Clatsop, State of Oregon, and being a portion of that property described in that Deed to Nick A. Hazapis and Mary N. Hazapis recorded

in Book 267, Page 169, Clatsop County Records, the said parcel being that portion of said property included in a strip of land variable in width lying on the Southwesterly side of the centerline of the Columbia River Highway as said Highway has been relocated, which centerline is described as follows:

Beginning at Engineer's Centerline Station 208+00, said Station being 1219.97 feet North and 1792.64 feet West of the East quarter corner of Section 27, Township 8 North, Range 6 West, Willamette Meridian; thence South 49°42' East 2900 feet to Engineer's Centerline Station 237+00.

The widths in feet of the strip of land above referred to are as follows:

STATION TO STATION		WIDTH OF SOUTHWESTERLY SIDE OF CENTERLINE
216+75	219+00	Northeasterly line of County Road
219+00	219+75	400 taper to 250
219+75	221+50	250 taper to 115
221+50	222+00	115 taper to 100
222+00	224+00	100
224+00	226+00	100 taper to 130

Title for Subject Property 1 is held in the name of R & Y 7206, LLC.

- b. **74853 Palm Creek Road, Clatskanie, Oregon 97016:** more particularly described as follows:

Parcel Number: 7424-00-00401

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Columbia, State of Oregon:

Beginning at the Northwest corner of the Northwest quarter of the Northeast quarter of Section 24, Township 7 North, Range 4 West, Willamette Meridian, Columbia County, Oregon; thence South 2°20' East

544.9 feet; thence South 57°24' East 928.6 feet to a point in Lindberg County Road Number P-64; thence South 56°36' West 20 feet to a point on the West boundary of the County Road and true point of beginning of the following described tract; thence West 300 feet to a point; thence North 155 feet; thence East to the West boundary of said County Road; thence South, along the West line of said road to the true point of beginning.

Title for Subject Property 2 is held in the name of Zhou Qu Rong.

- c. **74471 Palm Creek Road, Clatskanie, Oregon 97016:** more particularly described as,

Parcel Number: 7319-00-00401

The portion of Government Lot 3 in Section 19, Township 7 North, Range 3 West, Willamette Meridian, Columbia County, Oregon, described as follows:

Beginning at a point which is South 86 degree 58' East 402.50 feet from the West quarter corner of said Section 19, said point being on the North line of the Southwest quarter of said Section 19; thence South 1 degree 56'20" West a distance of 360.00 feet; thence South 86 degree 58' East a distance of 302.50 feet; thence North 1 degree 56'20" West a distance of 360.00 feet to the North line of said Southwest quarter; thence North 86 degree 58' West along said North line a distance of 302.50 feet to the point of beginning.

Title for Subject Property 3 is held in the name of Zhonghong Liao.

- d. **22197 Swedetown Road, Clatskanie, Oregon 97016:** more particularly described as,

Parcel Number: 7331-00-00500

A tract of land in the Southwest quarter of Section 31 Township 7 North, Range 3 West of the Willamette Meridian, Columbia County, Oregon described as follows:

Beginning at a point in the center of a creek 5 links wide, that is North 01°04' West, along section line 20.12 chains and North 89°49' East 14.96 chains from the Southwest corner of Section 31, Township 7 North, Range 3 West of the Willamette Meridian, Columbia County, Oregon, from said point of beginning; running thence in a Southerly direction following the channel of said creek upstream 846.5 feet to the Northern boundary line of

a certain County Road Survey (course of said road at this point being East and West); thence in a Easterly direction following said Northern boundary line of said survey 165.0 feet; thence North 14°30' East 875.5 feet; thence West 350 feet to the point of beginning.

Title for Subject Property 4 is held in the names Manching Lai, and Junmei He.

- e. **6525 Rickreall Road, Independence, Oregon 97351**: more particularly described as,

Parcel Number: 07427-00-00502

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Polk, State of Oregon:

Part of the James M. Allen DLC No. 50, Notification No 118, in Sections 27 and 34, Township 7 South of Range 4 West of the Willamette Meridian; Beginning at a point 33.98 chains West of the Southeast corner of the Donation Land Claim of James M. Allen Notification No. 118, Claim No. 50. in Township 7 South, Range 4 West of the Willamette Meridian; thence East 8.61 chains to an iron pipe 2 inches by 6 feet long; thence North 45.69 chains to a stone in the center of the County Road; thence North 83° West 8.73 chains along the center of said County Road; thence South 46.80 chains to the place of beginning.

SAVE AND EXCEPT that portion thereof lying South of the Northerly line of the Old State Highway, now known as Rickreall Road No. 7426.

Title for Subject Property 5 is held in the name of 7220 Investments LLC.

- f. **17344 Powers Creek Loop NE, Silverton, Oregon 97381**: more particularly described as,

Parcel Number: 071E09C 0030

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Marion, State of Oregon:

PARCEL I:

A tract of land situated in the South one-half of Section 9, Township 7 South, Range 1 East of the Willamette Meridian, in the County of Marion, State of Oregon, more particularly described as follows:

Beginning on the North line of the M. Coolidge Donation Land Claim No. 43 in Township 7 South, Range 1 East of the Willamette Meridian in Marion County, Oregon, at a point which is 1250.00 feet East of the Northwest corner of said claim; thence East 100.00 feet; thence South 00° 23' West 616.48 feet; thence South 89°33' East 206.00 feet; thence South 00°27' West 184.30 feet; thence South 89°33' East 349.10 feet; thence South 00°27' West 217.86 feet; thence West 654.66 feet; thence North 00°23' East 1023.00 feet to the place of beginning.

PARCEL II:

A tract of land situated in the South one-half of Section 9, Township 7 South, Range 1 East of the Willamette Meridian, in the County of Marion, State of Oregon, more particularly described as follows:

Beginning at a point which is 1350.00 feet East and South 00°23' West 616.48 feet and South 89°33' East 206.00 feet from the Northwest corner of the M. Coolidge Donation Land Claim No. 43 in Township 7 South, Range 1 East of the Willamette Meridian in Marion County, Oregon, which point is the most Westerly Northwest corner of property described in a conveyance to Harold D. Powell, recorded September 20, 1979 in Reel 185, Page 177, Deed Records for Marion County, Oregon; thence South 00°27' West 184.30 feet; thence South 89°33' East 146.80 feet to a point on the East line of the M. Coolidge Donation Land Claim No. 43; thence North 00°27' East 184.30 feet to the Southeast corner of the property described in a conveyance to G.A. and L.A. Patterson, recorded in Reel 777, Page 144, Deed Records for Marion County, Oregon; thence North 89°33' West, along said South line, to the place of beginning.

Title for Subject Property 6 is held in the name of Jin Feng Li.

- g. **1305 Clark Mill Road, Sweet Home, Oregon 97386:** more particularly described as,

Parcel Number: 13S 01E 32AA 00203

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Linn, State of Oregon.

Beginning at a point on the Westerly right of way line of Clark Mill Road that is South 0° 07' 18" East, 2444.28 feet and South 89° 52' 42" West, 40.00 feet from the Northeast Quarter of the Northeast Quarter of Section 32, Township 13 South, Range 1 E, Willamette Meridian, Linn County, Oregon; running thence South 0° 07' 18" East along said Westerly right of way line 161.53 feet; thence South 77° 00' 39" West, 125.30 feet; thence North 59° 57' 45" West 21.14 feet; thence; North 0° 01' 11" West, 155.85 feet; thence North 46° 04' 38" East, 24.46 feet; thence North 81° 51' 30" East, 70.32 feet thence South 86° 02' 07" East, 53.00 feet in the point of beginning

TOGETHER WITH an easement for Ingress and egress described as follows:

Beginning at a point in the center of Clark Mil Road, said point being North 89° 55' West 835.16 feet and South 0° 03' East 152.37 feet from the Northeast corner of Section 32, Township 13 South, Range 1 East of the Willamette Meridian, Linn County, Oregon; running thence South 76° 53' West 165.28 feet to an iron rod: thence South 0° 03' East 30.80 feet; thence North 76° 53' East 165.28 feet to the center of said road; thence North 0° 03' West 30.80 feet to the point of beginning.

Title for Subject Property 7 is held in the name of T & Y 6409 Inc.

- h. **31131 Old Santiam Hwy, Lebanon, Oregon 97355:** more particularly described as,

Parcel Number: 12S 01W 29C 00200

The following described real property in the County of Linn and State of Oregon free of encumbrances except as specifically set forth herein:

Beginning at an iron pipe, which is 2655.04 feet North and 230 feet South 89° 48' East of the Southwest corner of the Elmore Keys D.L.C. No. 53, in Section 29, Township 12 South, Range 1 West of the Willamette Meridian in Linn County, Oregon; thence South 89° 48' East 264.18 feet to a 1/2" iron pipe; thence South 23° 03' West 218.55 feet, more or less, to the North line of the Old Lebanon-Sweet Home Highway; thence North 69° 11' West along said North line 191.1 feet to a 1" axle; thence North 134.1 feet to the point of beginning, all being situated in Linn County, Oregon.

Title for Subject Property 8 is held in the name of 31131 Investment LLC.

- i. **20250 Highway 22, Sheridan, Oregon 97378:** more particularly described as,

Parcel Number: 06629-00-00100

A tract of land located in Section 29, Township 6 South, Range 6 West, of the Willamette Meridian in Polk County, Oregon, being more particularly described as follows:

Commencing at an iron rod marking a point on the northerly margin of Oregon State Highway 22, 40.00 feet from the centerline thereof, that is North 36.43 feet and East 607.83 feet from an aluminum cap in concrete marking the southwest corner of the John Ridgeway Donation Land Claim No. 43, said Township and Range; thence North 89°39'55" West 106.00 feet along said northerly margin parallel with and 40.00 feet distant from said centerline to the beginning of a 40.00 foot offset to a centerline 400 foot 6°00', spiral curve to the right beginning at engineers station 181+83.38 (back); thence 395.81 feet northwesterly along said spiral offset, the chord of which bears North 87°40'33" West 395.62 feet to the beginning of a non-tangent curve concave to the north having a radius of 1869.86 feet at engineers station 177+83.38; thence westerly 86.26 feet along said curve and said northerly margin, the chord of which curve bears North 82°20'37" West 86.26 feet, to an iron rod marking the beginning of a curve concave to the northeast and having a radius of 1869.86 feet and the Point Of Beginning of the herein described tract; thence 944.35 feet northwesterly along said curve and said northerly margin, the chord of which bears North 66°33'13" West 934.34 feet to an iron rod; thence leaving said northerly margin and said curve North 29°31'40" East 695.22 feet to an iron rod; thence South 89°45'28" East 258.93 feet to an iron rod; thence South 01°52'28" West 464.21 feet to an iron rod; thence South 87°41'33" East 270.80 feet to an iron rod; thence South 00°01'38" East 500.74 feet to the Point of Beginning, containing 11.18 acres of land, more or less, as shown on a map attached hereto and made a part thereof.

Basis of Bearings for this description is Polk County Survey, CS-13069.

Title for Subject Property 9 is held in the name of 20250 INVESTMENT LLC.

- j. **5145 Red Prairie Road, Sheridan, Oregon 97378:** more particularly described as,

Parcel Number: 06634-00-00400

The following described real property in the County of Polk and State of Oregon free of encumbrances except as specifically set forth herein:

All that portion of the following described tract of land lying Northerly of

the State Highway:

Beginning at the center of Section 34, in Township 6 South, Range 6 West of the Willamette Meridian in the County of Polk and State of Oregon; and running thence East 20.00 chains; thence North 5.71 chains; thence West 45 links, thence North 12.91 chains; thence West 19.55 chains; thence South 18.62 chains, to the place of beginning.

Excepting the North 61 feet thereof.

Title for Subject Property 10 is held in the name of Suying Liang.

k. **19090 Highway 22, Sheridan, Oregon 97378:** more particularly described as,

Parcel Number: 06628-D0-00900

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Polk, State of Oregon:

Beginning at a point 20.14 chains North from the Southwest corner of the Isaac Gilstrap Donation Land Claim, Notification No. 4985, Claim No. 53 in Section 33 of Township 6 South, Range 6 West of the Willamette Meridian, in Polk County, Oregon; thence North to a point 13.75 chains South of the Northeast corner of Lot 5, as set off to Anderson Hinshaw in that certain partition suit in the Circuit Court of the State of Oregon, for Polk County entitled Melissa Van Horn vs. Sanford Hinshaw, et al; thence West 11.00 chains; thence North 18°00' West 3.62 chains; thence North 11°30' East 2.14 chains; thence North 29° East 4.86 chains; thence North 39° East 200.0 feet, more or less, to the Southeasterly line of a tract of land conveyed to Lawrence C. Hiatt, et ux by Deed recorded April 21, 1961 in Volume 177, Page 210 of Deed of Records for Polk County, Oregon; thence North 72° East to the said Northeast corner of said Lot 5, which is the Southeast corner of the North half of the Isaac Hinshaw Donation Land Claim, Notification No. 4968, Claim No. 52; thence South 3.11 chains along the East line of said Claim No. 52 to a point 34.23 chains North of the Southwest corner of said Gilstrap Claim No. 5; thence South 60° East 8.34 chains to the Northwest corner of the 4.00 acres tract of land sold by Tom Blair and Mary Aikman and Sam Aikman on march 21, 1949; thence South 31° 50' West 11.70 chains to the Southwest corner of said 4.00 acre tract; thence North 72°35' West 92/100 chains to the Place of Beginning.

Title for Subject Property 11 is held in the name of Li Liu.

1. **91692 Taylorville Road, Westport, Oregon 97016:** more particularly described as,

Parcel Number: 80635BA01700

That part of parcel of land situated and being in the Northeast quarter of the Northwest quarter of Section 35, Township 8 North, Range 6 West, Willamette Meridian, County of Clatsop, State of Oregon, which is more particularly described and bounded as follows:

From the Northeast corner of the Northwest quarter of Section 35, marked by an iron pipe 2" in diameter by 6' long, proceed thence South along the East boundary of said quarter Section a distance of 681.6 feet; thence North 50° 40' West a distance of 131 feet; thence North 77° 50' West 209 feet; thence South 12° 10' West 22 feet to a point on the South side of the right of way of the Columbia Highway, which is the point of beginning of the description of the tract hereby conveyed; thence South 12° 10' West 275 feet; thence North 77° 50' West 60 feet; thence North 12° 10' East 275 feet to a point on the South side of the right of way of said highway; thence South 77° 50' East 60 feet to the point of beginning.

Title for Subject Property 12 is held in the name of Renxian Deng.

- m. **8850 Red Prairie Road, Sheridan, Oregon 97378:** more particularly described as,

Parcel Number: 06610-00-01400 01

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Polk, State of Oregon:

Beginning at a point which is 29.00 chains South of the Northwest corner of the Donation Land Claim of Hankinson F. Read and wife, being Claim No. 63 in Township 6 South, Range 6 West of the Willamette Meridian in Polk County, Oregon; running thence North 16 rods; thence East 100 rods; thence South 16 rods; thence West 100 rods to the place of beginning.

Title for Subject Property 14 is held in the name of Lucky 25500 Investment LLC.

- n. **7575 Blanchard Road, Sheridan, Oregon 97378:** more particularly described as,

Parcel Number: 06623-00-00100

Real property in the County of Polk, State of Oregon, described as follows: Beginning at the Northwest corner of the "L" of WM. Conners Donation land claim in section 14, Township 6 South, Range 6 West of the Willamette Meridian, Polk County, Oregon, and running thence South on the line between WM. Conner and James Morgan's Donation land claim's 16 rods; thence East to the public road; thence Northeasterly along said public road to the line between W. Conners and James Morgan donation land claim; thence west along said line to the place of beginning.

Title for Subject Property 15 is held in the name of Su Yi Liang.

- o. **2880 Kings Valley Highway, Dallas, Oregon 97338:** more particularly described as,

Parcel Number: 08508-00-01700

The following described real property, free of encumbrances except as specifically set forth herein in the County of POLK and State of Oregon, to wit:

Beginning at a point 15.00 chains west from the Northeast corner of the donation land claim of Nicholas Lee and wife, notification No. 2287, claim No. 50, in township 8 South, Range 5 west of the Willamette meridian in Polk County, Oregon, and running thence west a distance of 4.48 chains to the Southeast corner of the R. M. Guthrie's donation land claim; thence north a distance of 4.00 chains; thence west a distance of 42.57 chains to the east line of the right of way of the Salem-Falls city and western Railroad; thence South 25° 50' East along said right of way, a distance of 6.20 chains; thence South 20° 15' East a distance of 2.00 chains; thence South 15° 30' East a distance of 2.00 chains; thence South 3° 45' East a distance of 2.00 chains; thence South 3° 30' west a distance of 6.50 chains to the Northwest corner of a tract of land sold to Nellie M. Billings; thence East a distance of 3.16 chains to the center of the County road; thence South 13° 40' East in the center of said county road a distance of 7.50 chains to the North line of a tract of land sold to I. A. Guthrie; thence east on said line a distance of 38.90 chains; thence North a distance of 21.23 chains to the place of beginning.

Excepting therefrom that tract of land described as beginning at a point in the center of the county road leading from Dallas to Corvallis 4.00 chains North and 3.00 chains west of the southwest corner of said Guthrie donation land claim; thence west 45-1/2 Links to the east Boundary line of the S.F.C. & W.R.R. Co. Right of way; thence South 28° 00' East 6.20 chains along said right of way; thence South 21° 36' East 2.00 chains; thence South 13° 56' East 2.00 chains; thence South 4° 56' East 2.00 chains; thence South 1° 24' West

3.44 chains; thence leaving the railroad right of way and running thence East 3.40 chains to the center of the County road; thence North $15^{\circ} 52'$ East along the center of said county road, 1.46 chains; thence East 8.22 chains; thence North 13.25 chains; thence West 15.735 chains to the place of beginning.

Also excepting therefrom that tract described as beginning at a point where the center of said County road Crosses the South line of that tract of land described in deed recorded in Book 56, page 261, deed records for Polk County, Oregon; and conveyed by J. G. Van Orsdel and wife, to J. M. Card, the same being that principle tract herein conveyed; and running thence east a distance of 28.00 rods; thence North a distance of 17.25 rods; thence west a distance of 28.00 rods, more or less, to the center of said County road; thence Southerly along the center of said County road a distance of 17.25 rods, more or less, to the place of beginning.

Also save and except any of the above-described property lying within the boundaries of public roads and highways.

Also save and except: beginning at the Southwest corner of the P.P. Hooker Donation land claim No. 48, in Township 8 South, Range 5 West of the Willamette Meridian in Polk County, Oregon; thence North a distance of 264 feet; thence west a distance of 1771.11 feet; thence South a distance of 874.6 feet; thence Southeasterly in a straight line a distance of 510 feet, more or less, to the Northeast corner of that certain tract of land conveyed to Herbert R. Mcbee, et ux, by deed recorded October 23, 1939, in Book 102, Page 339, deed records for Polk County, Oregon; thence South a distance of 284.63 feet; thence east a distance of 2105.40 feet; thence North 1401.18 feet; thence west a distance of 295.68 feet to the place of beginning.

Further excepting therefrom a tract of land in said lee donation land claim described as beginning at the Southwest corner of the tract of land deeded by J. M. Card and wife, to Jacob Kinsey and wife, September 18, 1915, and recorded in Volume 62, Page 59, deed records for Polk County, Oregon, said point being on the easterly line of the Salem, falls city and western railroad company right of way; thence Southerly following said right of way 3.06 chains, more or less, to the Northwest corner of the tract of land deeded by J. G. Van Orsdel and wife, to Nellie M. Billings on July 18, 1908 and recorded in Volume 51, Page 365, deed records for Polk County, Oregon; thence East 3.61 chains to the center of the County road and the Northeast corner of said billings tract; thence Northerly along the center of said road to the most Southerly Southeast corner of said Kinsey tract; thence west 3.40 chains to the place of beginning.

Title for Subject Property 16 is held in the name of Ding Qiu Rong.

p. **4148 SE 79th Avenue, Portland, Oregon 97206**: more particularly described as,

Parcel Number: 1S2E08DD-09400

A tract of land situated in the southeast one-quarter of the southeast one-quarter of section 8, township 1 South, Range 2 East, of the Willamette meridian, in the City of Portland, County of Multnomah, and State of Oregon, more particularly described as follows:

The North one-half of the West one-half of the following property;

Beginning at a point in the East Line of the street laid out on the East side of a Tract platted and known as Kent, 645.2 feet northerly from the South line of section 8; running thence Northerly, parallel with the East line of Kent, 107 feet; thence easterly on a line parallel with the south line of section 8, a distance of 406.96 feet; thence southerly parallel with the East line of section 8, a distance of 107 feet; thence westerly 406.26 feet to the place of beginning.

Title for Subject Property 17 is held in the names Hui Yuan Chen and Li Xian Chen.

DEFENDANT REAL PROPERTIES are in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

DEFENDANT REAL PROPERTIES, *in rem*, represent property used or intended to be used to facilitate the manufacture and distribution of controlled substances (marijuana) in violation of 21 U.S.C. §§ 841, 846, and 856 and are forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(7), as more particularly set forth in the declaration of James Stratton, Deputy, United States Marshal Services, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of DEFENDANT REAL PROPERTIES, *in rem*, that due notice be given to

all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: Dated this 14th day of October, 2021.

Respectfully submitted,

SCOTT ERIK ASPHAUG
Acting United States Attorney

s/ Christopher Cardani
Christopher Cardani, MASB# 550609
Assistant United States Attorney
(503) 727-1000

VERIFICATION

I, DEPUTY JAMES STRATTON declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Deputy with the United States Marshal Services and that the foregoing Amended Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Amended Complaint *in rem* for Forfeiture is true as I verily believe.

s/ James Stratton
JAMES STRATTON
Deputy
United States Marshal Services